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17 *ByteDance Ltd., and TikTok LLC*

18  
19 IN THE UNITED STATES DISTRICT COURT  
20  
21 FOR THE NORTHERN DISTRICT OF CALIFORNIA

22  
23 IN RE: SOCIAL MEDIA ADOLESCENT  
24 ADDICTION/PERSONAL INJURY  
25 PRODUCTS LIABILITY LITIGATION

26 MDL No. 3047

27 Case No. 4:22-md-03047-YGR-PHK

28 **CORRECTED [PROPOSED] ORDER  
ON TIKTOK'S OMNIBUS SEALING  
MOTION**

1 This Document Relates to:

2 ALL ACTIONS

3 Judge: Hon. Yvonne Gonzalez Rogers  
4 Magistrate Judge: Hon. Peter H. Kang

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Upon consideration of the TikTok Defendants' Omnibus Sealing Motion Regarding Plaintiffs' Rule 702 and Summary Judgment Oppositions ("TikTok's Omnibus Sealing Motion"), the briefs and exhibits submitted in support thereof and in opposition, and arguments of counsel presented in this Court regarding the Motion, it is HEREBY ORDERED that the following portions of the documents identified below shall be filed under seal by the Clerk of the Court.

Document	Portions to be Sealed	Basis for Sealing	Whether Previously Sealed	Court's Ruling
Plaintiffs' Omnibus Opposition to Defendants' Motions for Summary Judgment [Dkt. 2414-1]	<b>Employee identifying information</b> p. 12, lines 13 and 15 (exhibit numbers) p. 12, line 14 (employee title) p. 78, lines 3-4 (employee names and titles) p. 78, lines 7 (employee name and title), line 9 (exhibit number), line 12 (employee name and title), line 13 (exhibit number) p. 79, line 21(exhibit number) p. 79, lines 21-22 (employee name and title) p. 80, line 5 (employee name and title), line 7 (exhibit number), lines 9-10 (employee names and titles), line 11 (exhibit number) p. 81, line 4 (employee name and title) p. 81, line 5 (exhibit number) p. 81, line 17 (employee name and title) p. 81, line 18 (exhibit number) p. 81, lines 19-20 (employee name and title) p. 81, line 21 (exhibit number) p. 82, line 1 (exhibit number), line 2 (employee name and title)	See TikTok's Omnibus Sealing Motion at III.D (Sealing the Names of Employees' Identifying Information Is Warranted). Declaration of Noreen Yeh ¶¶ 13–14.	To TikTok's knowledge, no party has previously sought to seal this information	

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	<p>3 p. 86, lines 15-16 (employee name and title), line 17 (exhibit number)</p> <p>4 p. 87, lines 24 (employee name and title), line 25 (exhibit number)</p> <p>5 p. 88, lines 3-4 (employee names and titles), 15 (employee names)</p> <p>6 p. 89, lines 24 (employee name and title), 26 (exhibit number)</p> <p>7 p. 90, line 6 (employee name), line 8 (exhibit number)</p> <p>8 p. 91, lines 24-25 (employee name and title)</p> <p>9 p. 94, lines 16 (employee name and title), line 17 (exhibit number), line 18 (employee name and title), line 19 (exhibit number), line 24 (employee name and title), line 26 (exhibit number)</p> <p>10 p. 95, lines 17-18 (employee name and title)</p> <p>11 p. 95, line 18 (exhibit number)</p> <p>12 p. 96, lines 18-19 (employee name), line 19 (exhibit number), line 21 (employee name and title), line 24 (exhibit number), line 25 (employee name), line 27 (exhibit number), line 27 (employee name)</p> <p>13 p. 97 lines 27 (employee name) and line 28 (exhibit number)</p> <p>14 p. 98, lines 11 (employee name and title), line 12 (exhibit number), line 14 (employee name and title), line 15 (exhibit number), line 16 (employee names)</p> <p>15 p. 100, lines 13 (employee name and title), 16 (exhibit number), 20-21 (employee name and title), line 22 (exhibit number)</p> <p>16 p. 106, lines 4 (employee names), line 6 (exhibit number), line 8 (employee</p>			

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	<p>name and title), line 9 (exhibit number), line 24 (employee name and title), line 25 (exhibit number)</p> <p>p. 107, line 13 (employee name and title)</p> <p>p. 111, lines 7 (employee name), line 9-10 (employee names and titles), line 10 (exhibit number), lines 11-12 (employee names), line 12 (exhibit number), line 13 (employee name), line 14 (exhibit number), line 20 (employee name), line 20 (exhibit number), line 22 (employee name), line 24 and 26 (exhibit number), lines 27-28 (employee names and titles)</p> <p>p. 112, line 1 (employee name), line 2 (exhibit number), line 16 (employee names and titles), line 18 (exhibit numbers)</p> <p>p. 113, line 4 (employee name and title), line 6 (exhibit number)</p>			
Plaintiffs' Omnibus Opposition to Defendants' Motions for Summary Judgment [Dkt. 2414-1]	<p><b>User data / operational metrics</b></p> <p>p. 78, lines 17 (number of daily active users), 19-20 (number of minutes representing user stay duration)</p> <p>p. 79, line 5 (percentage decline in stay duration)</p> <p>p. 80, line 24 (percentage of daily new users)</p> <p>p. 81, line 7 (number of age 14-18 users in 2018)</p> <p>p. 81 line 8 (number of age 14-18 users in 2022 and the phrase after the number “2022” and before the word “in”, which describes the number of 14-18 users in 2024)</p> <p>p. 81 lines 9-13 (chart describing number of age 14-18 users from 2018-2024)</p>	<p>See TikTok's Omnibus Sealing Motion at III.A (User Data / Operational Metrics).</p> <p>Declaration of Noreen Yeh ¶¶ 4-5.</p>	<p>To TikTok's knowledge, no party has previously sought to seal this information</p>	

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	<p>3 p. 81 lines 16-17 (percentage user penetration rate)</p> <p>4 p. 81 line 17 (phrase after the word "was" that describes penetration rate)</p> <p>5 p. 81, line 23 (number of minutes of average daily time spent on the app)</p> <p>6 p. 82, line 3 (percentage of Gen Z users), line 7 (number of times users opened the app and number of minutes spent on the app), line 9 (percentage of audience between ages 13 and 24), line 11 (percentage of audience between ages 13 and 17), line 12 (the phrase between the two em dashes, which represents a description of its audience between ages 13 and 17), line 13 (number of minutes that users between ages 13 and 17 spent on the platform),</p> <p>7 p. 82, line 14 (percentage of monthly active users ages 13-17)</p> <p>8 p. 91, line 23 (number of users and number of time that they spent on the app)</p> <p>9 p. 92, line 24 (percentage of users aged 13-15 and percentage of users aged 16-17)</p> <p>10 p. 93, lines 1, 7 (fraction of users that received notifications at specified times)</p> <p>11 p. 94, line 4 (percentage and number of users under 13)</p> <p>12 p. 98, line 19 (percentage impact of changes on platform features)</p> <p>13 p. 100, line 14 (percentage of acceptable reduction in user time)</p> <p>14 p. 100, line 15 (number of time of acceptable reduction in user time)</p> <p>15 p. 100, lines 21 (number representing usage of opt-in features)</p>			

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	<p>1 p. 100 line 22 (percentage of users 2 that were expected to use opt-in 3 tools), line 23 (percent reduction of 4 time spent on platform)</p> <p>5 p. 101, line 2 (percentage of users 6 who swiped past prompts)</p> <p>7 p. 101, lines 22-23 (phrase after the 8 word “was” and before “Ex. 552” 9 representing company operational goals)</p> <p>10 p. 102, line 3 (number of time minors 11 spend per day on the platform and percentage that were “heavy” users), line 7 (percentage of minors active on the platform at night)</p> <p>12 p. 107, line 5 (percentage of videos 13 served to a “depression” related account)</p> <p>14 p. 107, line 15 (percentage of 15 allowable effect on reduction in time spent), line 17 (percentage of 16 effectiveness of a platform feature change)</p> <p>17 p. 109, line 6 (percentage decline in 18 daily active users)</p> <p>19 p. 114, lines 3 (number of account 20 deletion requests), lines 8-9 (percentages of users that quit their 21 account deletion process), line 11 (percentage reflecting reasons that 22 users sought to delete their accounts)</p>			
23 Plaintiffs' Omnibus Opposition to Defendants' Motions for Summary Judgment [Dkt. 2414-1]	<p><b>24 Description of internal proprietary processes</b></p> <p>25 p. 90, lines 16-19 (portion containing description of how TikTok's internal dashboards function that appears between “dashboards” and “Ex. 556”).</p> <p>26 p. 106 lines 15-17 (two full sentences that are contained on these lines, which reflect the way that TikTok's</p>	<p>27 See TikTok's Omnibus Sealing Motion at III.A (Internal Proprietary Processes).</p> <p>28 Declaration of Noreen Yeh ¶¶ 8-10.</p>	<p>To TikTok's knowledge, no party has previously sought to seal this information</p>	

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	<p>algorithm functions)</p> <p>p. 106 line 22 (description in parenthetical that describes how TikTok's algorithm functions)</p> <p>p. 108, lines 19-20 (phrase starting after the word "to" and ending before "Ex. 529" describing how notifications are strategically optimized)</p> <p>p. 114, line 24 (phrase after "maintained" and before "while" that describes how TikTok's internal processes function)</p>			
Plaintiffs' Omnibus Opposition to Defendants' Motions for Summary Judgment [Dkt. 2414-1]	<p><b>Revenue and financial information</b></p> <p>p. 78, lines 4-5 (dollar amounts representing advertising revenue targets per quarter, daily revenue, and annual revenue)</p> <p>p. 80, lines 18-19 (phrase after the word "approximately" and before "Ex. 508" reflecting financial information about its advertising spending)</p> <p>p. 81, lines 22 (dollar amount representing advertising revenue)</p> <p>p. 82, line 14 (phrase in quotation marks that describes financial attributes of Gen Z users)</p> <p>p. 85, lines 22-23 (phrase after "initiative" and before "Ex. 471" that describes relationship between TikTok and influencers)</p> <p>p. 85, lines 24-25 (phrase after "community" and before "to" that describes influencer payment information)</p> <p>p. 95, line 28 - p. 96 line 1 (phrase after "projected" and before "Ex. 407" that describes financial</p>	<p>See TikTok's Omnibus Sealing Motion at III.B (Sealing Revenue and Financial Information Is Warranted).</p> <p>Declaration of Noreen Yeh ¶¶ 6-7.</p>	<p>To TikTok's knowledge, no party has previously sought to seal this information</p>	

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	attributes of particular features) p. 96, line 14 (user base percentage) p. 107, line 11 (percentage effectiveness of platform feature)			
Plaintiffs' Omnibus Opposition to Defendants' Motions for Summary Judgment [Dkt. 2414-1]	<b>Proprietary Information Related To Third Parties</b> p. 83, lines 15-16 (phrase between "PTA" and "Ex. 444A" that describes terms of sponsorship agreement with PTA) p. 83, lines 17-18 (phrases between "clause" and "including", between "a" and "in" and between "additional" and "in" that describe terms of sponsorship agreement with PTA) p. 84, lines 26-27 (phrase between "control" and "Ex. 444A" that describes terms of agreement with PTA) p. 85, line 1 (dollar figure representing payment amount to TikTok partner) p. 85, lines 9-10 (phrase after em dash and before "Ex. 444B" describing payment terms with TikTok partner)	See TikTok's Omnibus Sealing Motion at III.A (Third Party Information). Declaration of Noreen Yeh ¶¶ 11-12.	To TikTok's knowledge, no party has previously sought to seal this information	
Plaintiffs' Omnibus Opposition to Defendants' Motions for Summary Judgment [Dkt. 2414-1]	<b>Third party identifying information</b> p. 82, lines 8, 11 (names of TikTok brand partners) p. 87, line 13 (name of external consultant) p. 92, line 13 (name of external consultant)	See TikTok's Omnibus Sealing Motion at III.C (Sealing Information to Protect Non-Parties' Privacy Is Warranted). Declaration of Noreen Yeh ¶¶ 11-12.	To TikTok's knowledge, no party has previously sought to seal this information	

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Plaintiffs' Opposition to Defendants' Motion to Exclude Plaintiffs' Experts' General Causation Opinions for Failure to Account for Section 230 and the First Amendment, Dkt. 2408 – Ex. 3, July 9, 2025 expert report of Dr. Chris Mattmann [Dkt. 2409-6]	<b>Description of the architecture of the TikTok platform, including detailed strategies used to identify prohibited users and detect harmful or inappropriate content</b>  Sealed in its entirety	See TikTok's Omnibus Sealing Motion at III.A (Internal Proprietary Processes).  Declaration of Noreen Yeh ¶¶ 4–5.	To TikTok's knowledge, no party has previously sought to seal this information	

## IT IS SO ORDERED.

Dated:

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Hon. Yvonne Gonzalez Rogers  
United States District Judge